



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

JUN 13 1995

Edward A. Hogan
Porzio, Bromberg & Newman
163 Madison Avenue
Morristown, NJ 07960

JUN 12 1995

Re: Hexcel Corporation (Hexcel)
Lodi Borough, Bergen County
ISRA Case #86009

Dear Mr. Hogan:

Please be advised that the New Jersey Department of Environmental Protection (NJDEP) has completed its review of the Remedial Action Reports (RAR) dated September 30, 1994, October 24, 1994, January 16, 1995 and April 12, 1995 and revised cleanup cost estimates provided by both the Fine Organics Corporation and Hexcel dated October 19, 1994 and October 31, 1994, respectively. The NJDEP's comments regarding the Remedial Action Reports and the revised cost estimates are noted below:

I September 30, 1994 RAR

1. The proposal to defer the installation of the bedrock monitoring well in the vicinity of MW1 is acceptable.

II Fine Organics Corporation's October 19, 1994 Correspondence

2. The revised remedial cost estimate provided by the Fine Organics Corporation is unacceptable. However, be advised that the October 31, 1994 revised remedial cost estimate provided by Hexcel is acceptable.

3. The Fine Organics Corporation has requested the NJDEP's position in regard to whether Hexcel can utilize nonresidential standards for the site and compel the Fine Organics Corporation to place an institutional control (i.e. Declaration of Environmental Restriction) on its property. The NJDEP's position on this matter is as follows. If Hexcel proposes to use nonresidential soil cleanup criteria for this site, the conditions set forth in P.L. 1993, c. 139 section 4i, must be met. If any of the conditions are not met, the NJDEP can only accept remedial actions which result in an "unrestricted" (i.e. residential) remediation.



III October 24, 1994 RAR

4. The proposed DNAPL monitoring plan is acceptable with the following condition. Hexcel shall review the historical volatile organic compound results for all the monitoring wells and include in the dense non-aqueous phase liquid (DNAPL) monitoring program, in addition to the monitoring wells already proposed, those wells that have contained any compound in excess of 1% of its effective solubility. Hexcel shall monitor these wells monthly and then quarterly if no DNAPL is detected during the first three months of monitoring. Hexcel shall continue with the proposed monitoring program and submit an evaluation with the results of the latest quarter of DNAPL monitoring. The NJDEP previously approved a proposal to monitor only those wells that either contained DNAPL or were near wells that contained DNAPL. However, as the occurrence of a contaminant at levels as low as 1-10% of its effective solubility (i.e. depending on the rate of ground water flow) is commonly interpreted to be indicative of the presence of DNAPL, the NJDEP believes this criterion is appropriate for the selection of DNAPL monitoring wells.
5. The proposed light non-aqueous phase liquid (LNAPL) monitoring plan is acceptable.
6. The proposed water level monitoring plan is acceptable.
7. The proposed temporary DNAPL recovery plan is acceptable.
8. Hexcel proposes to modify the ground water recovery system and install a permanent recovery system on the basis of hydraulic testing results and recovery system pilot testing results. However the Remedial Action Schedule does not include any submission dates for the design proposal for the permanent recovery system. Hexcel shall submit a proposal for the design of the permanent recovery system before its installation so that the NJDEP can evaluate whether the proposed system can meet the NJDEP's minimum cleanup requirements. Please be advised that any future schedules shall include a date for the submission of this proposal.
9. The proposed LNAPL recovery plan is acceptable with the following conditions. Hexcel shall, based on the results of the LNAPL monitoring plan recover LNAPL at additional wells as necessary. Hexcel shall submit the recovery results quarterly. Additionally, be advised that as the NJDEP understands that the migration of LNAPL from the site will be hydraulically controlled via the ground water recovery system, installation of automatic LNAPL pumps may be required if thicker accumulations of product appear under ground water pumping conditions.
10. See comments to April 12, 1995 RAR listed below concerning the required off-site sampling of the ground water opposite the Saddle River.
11. Hexcel has stated that the installation of additional monitoring wells to delineate the contaminant plume south of MW22 and MW31 can not be completed as there is insufficient room due to the adjacent NAPP Technologies, Inc. building. However, due to the recent tragic explosion and subsequent fire at the NAPP Technologies, Inc site, the above statement is no longer valid and the delineation of the contaminant plume is still required. Therefore, based on the

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unforeseen circumstances at the NAPP Technologies, Inc. facility, which includes the demolition and subsequent removal of the building debris, Hexcel shall investigate the possibility of installing monitoring wells on the NAPP Technology, Inc. property in order to adequately delineate the contaminant plume south of MW22 and MW31. Please be advised that the ability to utilize monitoring wells installed for any potential ground water investigation at the NAPP Technologies, Inc. site may be acceptable for the delineation of the contaminant plume.

12. Hexcel has proposed to remove DNAPL from the wells with a bailer until an automated pumping system can be installed. Hexcel shall evaluate whether pumping from the bottom of the wells might allow recovery of more product without resulting in a significant increase in the amount of water recovered.

IV January 16, 1995 RAR

13. The proposal to modify the DNAPL monitoring plan by the inclusion of monitoring well CW-12 is acceptable.

14. The proposal to modify the DNAPL recovery plan by reducing the frequency of DNAPL recovery from weekly to twice a month is unacceptable. Hexcel shall recover DNAPL on a weekly basis at every well that contains recoverable product.

V April 12, 1995 RAR

15. The proposal to modify the LNAPL monitoring plan whereby the monitoring frequency is reduced at well P-2 and increased at monitoring well RW1-1 is acceptable.

16. In the water level and product measurement tables Hexcel records that a "trace brown product on probe" is detectable for some of the wells. For future reporting, if product is detected on the probe, Hexcel shall clarify as to whether the product is believed to be either DNAPL or LNAPL. Additionally, the presence of product on the probe shall be considered equivalent to detection of product in the well, thereby triggering the collection of monthly product measurements and attempts at product recovery at the respective well.

17. As Hexcel has anticipated the sewer to be completed by late May 1995, Hexcel shall provide an update on the status of the installation including comments on the status of the Stream Encroachment Permit. Hexcel shall submit this update within 30 calendar days of receipt of this letter.

18. Please be advised, that the NJDEP is willing to approve the use of existing monitoring wells with their associated ground water sampling data in lieu of sampling ground water on the opposite side of the Saddle River by the Geoprobe technique; however, the three referenced off-site monitoring wells appear to be in unsuitable locations. As the objective of the ground water sampling is to determine whether contamination in the general area of MW8 has migrated under the river, monitoring well MWX appears to be roughly 200' too far to the south for such an investigation and MWY and MWZ appear to be too far to the north.

Therefore, Hexcel shall submit the Geoprobe proposal as previously required in the NJDEP's September 15, 1994 letter.

19. The revised Remedial Action Schedule is acceptable. However as noted in item 8 above Hexcel shall include the submission dates of any interim proposals required for NJDEP review on all future Remedial Action Schedules. Be advised that the next progress report is due in this office by July 30, 1995.

IV General Requirements

20. Hexcel shall provide an update on the effects of the explosion at the adjacent NAPP Technologies, Inc. site with regard to the ongoing remediation at Hexcel. Previous reports to the Case Manager have indicated that the Hexcel basement was flooded with approximately 100,000 gallons of water from the firefighting activities at the NAPP Technologies, Inc. site and the influx of this water which is contaminated with Polychlorinated Biphenyls (PCB) has damaged the ground water treatment system.

21. Hexcel shall submit the results or additional work plans, in triplicate, in accordance with the approved schedule. Please note that only one copy of the Quality Assurance/Quality Control Deliverables is needed.

22. Hexcel shall submit summarized analytical results in accordance with the Technical Requirements For Site Remediation, N.J.A.C. 7:26E.

23. Hexcel shall collect all samples in accordance with the sampling protocol outlined in the May, 1992 edition of the NJDEP's "Field Sampling Procedures Manual".

24. Hexcel shall notify the assigned BEECRA Case Manager at least 14 calendar days prior to implementation of all field activities included in the Remedial Action Workplan. If Hexcel fails to initiate sampling within 30 calendar days of the receipt of this approval, any requests for an extension of the required time frames may be denied.

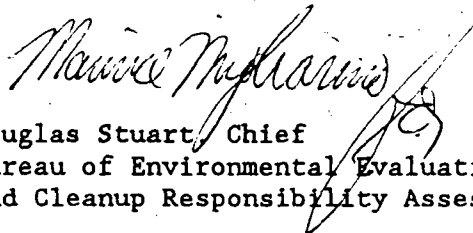
25. On February 22, 1994, the NJDEP promulgated the ISRA Fee Rule amendments at 26 N.J.R. 1142, which were proposed on April 5, 1993 at 25 N.J.R. 1375. Pursuant to the fee rule amendments, the NJDEP will bill an owner or operator according to the direct billing formula at N.J.A.C. 7:26B-1.10(f)2. At this time, the NJDEP intends to process bills on a semi-annual basis. The NJDEP encourages responsible parties to use the "Technical Requirements for Site Remediation" (N.J.A.C. 7:26E) as well as any other current NJDEP guidance documents to assist in remediation activities and thereby minimize NJDEP review time. The complexity of the environmental contamination at the site and the quality of the workplans and reports submitted to the NJDEP will dictate the oversight costs to the regulated community.

26. Pursuant to N.J.S.A. 58:10B-3, a remediation funding source is to be established in an amount equal to or greater than the cost estimate of the implementation of the remediation and shall be in effect for a term not less than the actual time necessary to perform the remediation at the site. N.J.S.A. 58:10B-3 allows for a change of the amount in the remediation funding source as the cost estimate changes. Please provide the current estimated cost of the

remaining remediation required at the site. Any increases in the estimated cost estimate will require an increase in the amount in the Remediation Funding Source to an amount at least equal to the new estimate. Any requests to decrease the amount in the remediation funding source will be reviewed and approved by the NJDEP upon a finding that the current remediation cost estimate will be sufficient to fund all necessary remediation.

If you have any questions, please contact the Case Manager, Joseph J. Nowak, at (609) 777-0899.

Sincerely,



Douglas Stuart, Chief
Bureau of Environmental Evaluation
and Cleanup Responsibility Assessment

c: Beverly Phillips, BGWPA
A. William Nosil, Hexcel Corporation
James Higdon, Fine Organics Corporation